UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 21 2011

REPLY TO THE ATTENTION OF:

WC-15J

CERTIFIED MAIL 7009 1680 0000 7672 4869
RETURN RECEIPT REQUESTED

Mr. David Ginder
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Subject: **EPA Oversight Inspection Report**

Dear Mr. Ginder:

Enclosed, please find a copy of the U.S. Environmental Protection Agency's (EPA) Oversight Inspection Report for the inspection conducted by EPA on September 19, 2011 at Stribling Hog Farm. The purpose of the EPA oversight inspection report is to evaluate the Illinois Environmental Protection Agency's (IEPA) inspection report from the inspection conducted on April 21, 2011 and subsequent findings at Stribling Hog Farm.

Should you find anything in the report that you disagree with, please provide a detailed response.

Thank you for your prompt attention to this matter. If you have any questions, please contact Cheryl Burdett of my staff at (312) 886-1463.

Sincerely,

James A. Coleman, Acting for

Ryan J. Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Enclosures

cc: David Ginder, Springfield Office, IEPA
Bruce Yurdin, IEPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5

CWA OVERSIGHT INSPECTION REPORT
ILLINOIS

The purpose of this document is to provide an evaluation of a Concentrated Animal Feeding Operation inspection conducted by the Illinois Environmental Protection Agency (IEPA). This evaluation is conducted via comparison to a similar inspection performed by the U. S. Environmental Protection Agency (EPA).

Inspection facility	Stibling Hog Farm 30663 Centinary Road Ashland, IL 62612
NPDES permit status	None
IEPA inspection date	May 31, 2011
EPA inspection date	September 19, 2011

Stribling Hog Farm is a large, swine Concentrated Animal Feeding Operation located in Ashland, Illinois. IEPA conducted an inspection at the site on May 31, 2011 and noted deficiencies during the inspection, but determined that those deficiencies did not require the facility to obtain a National Pollutant Discharge Elimination System (NPDES) Permit (Attachment 1). On September 19, 2011, EPA conducted an inspection at the facility and found compliance issues with Stribling Hog Farm's mortality management and failure to obtain a stormwater construction permit for disturbing greater than one acre of land.

Findings from the IEPA inspection are summarized below:

Area of concern	**Identified by IEPA May 31, 2011**
Rotten grain pile. No evidence of a discharge to waters of State. IEPA advised the facility to collect grain more frequently and keep it land applied rather than allowing it to accumulate.	X
IEPA advised the facility to a maintain a minimum of 2' freeboard, to repair the low spot on the east side of the berm of primary cell, and to install a better FB marker.	X

The content of the inspection report is summarized below:

General Information

Included in Report?	**IEPA inspection May 31, 2011**
Date and time of inspection	Yes, (Date and Time included)

Type and purpose of inspection	Yes, (Type is checked), No, (Purpose is not identified in the report)
Facility information	Yes
NPDES or other ID number	NA (Facility is not permitted)
Inspection participants listed	Yes (Inspection participant(s) listed)

Facility Information

Included in Report?	**IEPA inspection May 31, 2011**
Facility description and areas evaluated	Yes
Description of NPDES regulated activities pertinent to the inspection	A facility description is provided; including a description of areas of concern, which IEPA described problems with the lagoon berm, freeboard levels, and freeboard marker concerns.
Regulated areas evaluated during inspection	Yes, Livestock Description, Description of waste containment system, Mortality Management, Storage lagoon evaluated.

Inspector Observations and Documentary Support of Observations

Included in Report?	**IEPA inspection** ***Date of IEPA inspection***
Narrative description of field activities conducted	Yes, the number of acres for land application, land application and Nutrient Management Description of setbacks, and calibration of equipment,
Permit requirement	Yes
Observations made regarding permit requirements	IEPA wrote within the comment section of the checklist that no NPDES permit is required at this time.
Information to support the observations that are made	No, No photo log or sampling was done. IEPA had noted deficiencies, but did not photograph the deficiencies.
Inspection checklists	Yes
Corrective actions	Yes
Report date and signatures	Yes

Inspection Report Sufficiency

INSPECTION	EVALUATION
IEPA inspection May 31, 2011	The inspection report includes a description of animals, barns, waste handling, mortality management, land application equipment, acreage, and paths to waters of the United States. The report also documents that the facility has a Comprehensive Nutrient Management Plan (CNMP). IEPA recorded the estimated annual gallons of wastewater at the facility. IEPA also described areas of concern with the lagoon and advised the facility of the need to correct the deficiencies. The inspection report does not describe IEPA's field inspection activities. IEPA documented in the report that the facility had a CNMP and that it was up to date, but there was no documentation as to the records that were reviewed; such as manure and/or soil analyses that are required annually and every five years respectively. There report also did not provide information on the waste storage capacity for the facility. IEPA documented in the checklist that self monitoring documents were not done as part of the CNMP, but did not describe this as a deficiency in the notes. It also was not clear from the checklist how it was determined that manure and wastewater are being applied in accordance with setback/buffer requirements of the NMP. The report described areas of concern with the lagoon. However, photos should have been taken of these deficiencies that were observed during the May 31, 2011 Inspection.

Signature: _____ **Date:** 12-16-11

Attachment:

IEPA inspection report ***Date of IEPA inspection report***.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Livestock Facility Inspection Checklist

GENERAL INFORMATION

TYPE OF INSPECTION:
☒ CAFO ☐ COMPLAINT ☐ RECONNAISSANCE ☐ ERU FOLLOW UP ☐ OPERATOR REQUEST ☐ OTHER

FACILITY NAME (LLC, Inc., Corp, Partnership, sole proprietorship, etc.)	INSPECTION DATE	ARRIVAL TIME
Stribling Hog Farm	**5-31-11**	**9:22 a.m.**

ADDRESS	INSPECTOR(s)	DEPARTURE TIME
30663 Centinary Road	**David Ginder**	**11:25 a.m.**

CITY	STATE	ZIP CODE	ACCOMPANIED BY (if applicable)
Ashland	**Illinois**	**62612**	**NA**

LEGAL DESCRIPTION	COUNTY	SECTION	TOWNSHIP	RANGE	TEMPERATURE	PRECIPITATION TYPE
	Cass	**SW & NE 9**	**17N**	**8W**	**77°F - 79°F**	**Light Rain**

	NAME	CONTACTED	PHONE	MOBILE
Facility Owner(s): Exemption 6 and Exemption 7C	**Shawn Stribling**	☒ YES ☐ NO	Exemption 6 and Exemption 7C	
	ADDRESS	CITY	STATE	ZIP CODE
	NAME	CONTACTED ☐ YES ☐ NO	PHONE	MOBILE
	ADDRESS	CITY	STATE	ZIP CODE
Facility Operator(s): Exemption 6 and Exemption 7C	NAME	CONTACTED ☐ YES ☐ NO	PHONE	MOBILE
	ADDRESS	CITY	STATE	ZIP CODE
	NAME	CONTACTED ☐ YES ☐ NO	PHONE	MOBILE
	ADDRESS	CITY	STATE	ZIP CODE

NPDES PERMIT INFORMATION (If no NPDES Permit, skip this section)

1. What type of NPDES permit has been issued? ☐ Individual NPDES Permit ☐ General NPDES Permit	NPDES #	
2. What date was the NPDES permit issued?		
3. What date does the NPDES permit expire?		
4. Is a copy of the NPDES permit onsite?	☐ YES	☐ NO
5. Permitted number of animal units?		
6. Does the NPDES Permit contain a compliance schedule?	☐ YES	☐ NO
7. Have there been any changes made to the production area since the permit was issued?	☐ YES	☐ NO

If "YES", provide a detailed description of those changes.

None

LAND APPLICATION/NUTRIENT MANAGEMENT		
1. How many TOTAL acres are available for land application? **1,042** acres		
2. How many acres are READILY available for land application at the time of inspection? **0** acres		
3. Estimated annual quantities of liquid waste **3 MG** gallons		
4. Estimated annual quantities of solid waste **NA** tons		
5. Does the facility have a contractor perform land application? If "YES", Name of Contractor: **NA**	☐ YES	☒ NO
6. What type of land application equipment is available to the facility? ☐ Umbilical Injection ☒ Honeywagon Injection ☐ Honeywagon Surface ☐ Irrigation ☐ Rotational Gun ☐ Manure Spreader ☐ Vegetative Filter ☐ Other _____		
7. Does the facility calibrate the land application equipment? If "YES", What method is used? **Known gallons covering a known acreage - have flowmeter - looking into variable rate technology**	☒ YES	☐ NO
8. Does the facility land apply within the 150 foot setback from any water well? If "YES", Explain	☐ YES	☒ NO
9. Does the facility land apply within the 200 foot setback from any surface water? If "YES", Explain	☐ YES	☒ NO
10. Does the facility land apply near any residences? If "YES", Explain **Observe a 150' setback and inject**	☒ YES	☐ NO
11. Is livestock waste transferred off-site to another party? If "YES", Are records of manure transfers kept? If "YES", Ask to see records	☐ YES ☐ YES	☒ NO ☐ NO
12. Does the facility have a current NMP or CNMP? If "YES", Does the facility maintain a copy of the nutrient management plan (NMP) onsite?	☒ YES ☒ YES	☐ NO ☐ NO
13. Does the NMP reflect the current operational characteristics (number of animals, cropping, etc.)?	☒ YES	☐ NO
14. Are the number of acres owned/leased consistent with those in the NMP?	☒ YES	☐ NO
15. Is manure and wastewater being applied in accordance with setback/buffer requirements of the NMP?	☒ YES	☐ NO
16. Are all of the records identified in the NMP being maintained and kept current?	☒ YES	☐ NO
17. Are records being maintained at the required frequency?	☒ YES	☐ NO
18. Are records being maintained onsite for the period required by NMP and/or NPDES permit?	☒ YES	☐ NO
19. Is the NMP adequately addressing the storage, handling and application of manure and wastewater to prevent discharges to waters of the U.S.?	☒ YES	☐ NO

LIVESTOCK FACILITY DESCRIPTION

Facility Type	
☒ Total Confinement Buildings	☐ Open Earthen Feedlot
☐ Open Confinement Buildings	☐ Vegetated Pasture
☐ Open Concrete Feedlot	☐ Other _____

Type of Animals	Number of Animals (currently)	Capacity	Type of Confinement
SWINE > 55 LBS	**7,400**	**7,400**	**Total - pits**

Does the facility have an Illinois Certified Livestock Manager (300 or greater animal units)?	☐ N/A	☒ YES	☐ NO
If greater than 1000 animal units but less than 5000 animal units, does the facility have a waste management plan?	☐ N/A	☒ YES	☐ NO
If greater than 5000 animal units, has the facility submitted a waste management plan to IDOA for review?	☒ N/A	☐ YES	☐ NO
Does the facility have any other locations under common ownership, or where equipment and/or manure is shared, or where the other site shares land application sites? If so, put names and addresses below. **None**		☐ YES	☒ NO

LIVESTOCK WASTE STORAGE

1. Does the facility have any existing livestock waste containment system? ☒ YES ☐ NO
   If NO, then proceed to question 10.

2. General description of the waste containment system (include solid and liquid manure handling, mortality, and feed storage areas).

   Old building shallow pit to lagoon. Other six buildings have deep pits.

   Enclosed feed bins and mill. Feed mill inspected by IDOA - John Zook.

   Deads are rendered three times a week.

Type of Storage	Total Storage Capacity (Specify Units)
☒ Anaerobic Lagoon	
☐ Covered Lagoon	
☐ Holding Pond	
☐ Above Ground Storage Tank ("Slurrystore")	
☐ Below Ground Storage Tank	
☐ Settling Basin	
☐ Roofed Storage Shed	
☐ Concrete Pad	
☐ Impervious Soil Pad	
☒ Underfloor Pits	
☐ Anaerobic Digester	
☐ Manure Stacks	
☐ Vegetative Filter	
☐ Other _____	
☐ None	

3. Do the storage structures have depth markers or staff gauges? ☒ YES ☐ NO

4. Are levels of manure in the storage structures recorded and records kept? ☐ YES ☒ NO

5. Do the storage structures have adequate freeboard? ☐ YES ☒ NO

6. Estimated final stage storage structure freeboard **16** in.

7. Do facility personnel perform routine visual inspections of the storage structures? ☒ YES ☐ NO

8. Are the routine visual inspections documented? ☐ YES ☒ NO

9. Does the system have an outfall or discharge point? ☐ YES ☒ NO

If "YES", please provide a description (overflow pipe, spill way, etc. Include a description the area receiving the discharge).

None

10. Are there any portions of the production area where runoff is not controlled? ☒ YES ☐ NO

If "YES", provide a detailed description of the area(s) of concern:

Rotten grain pile. No evidence of discharge to waters of State. To remove and land apply. Advised the collect grain frequently and keep it land applied rather than allowing it to accumulate.

MORTALITIES MANAGEMENT

1. How are mortalities managed? (Composted, buried, burned, rendering service, other)

Rendering service - Darling Int. M-W-F.

2. Are mortalities documented and are records kept? ☒ YES ☐ NO

FACILITY WATER SOURCES

1. What type of method is used to provide drinking water for the animals?
   ☐ Overflow waters ☐ Tip Tanks ☐ Nipple waters ☒ Water Bowls ☐ Other _____

2. How is the water for animals obtained?
   ☐ Community PWS ☐ On-Site Well ☒ On-Site Impoundment ☐ Other _____

3. Is a mist cooling system used? ☒ YES ☐ NO
   How is mist water contained?
   Misterson timers - water enters pits.

DAIRY OPERATION (If No Dairy, skip this section)

1. How many times per day are cows milked? _____

2. Describe how the dairy's non-contact cooling water is contained (Example: it is reused for drinking water for the animals).
   None

3. Describe how the milking parlor is cleaned (hose or flush) and where the process wastewater goes and how it is contained.
   None

4. Describe how the tank(s) are washed and where the process wastewater goes and how it is contained.
   None

5. Describe where process wastewater from the plate cooler goes and how it is contained.
   None

BEDDING (If No Bedding, skip this section)

1. Describe what type of bedding is used for the animals.
   None

2. Describe how bedding is collected and how often.
   None

3. What is done with the used bedding? ☐ Reused ☐ Land Applied

MANURE COLLECTION

1. How is manure collected?

- ☒ Under Floor Pit
- ☐ Scraped: ☐ Automatic ☐ Manual
- ☐ Flush
- ☐ Solids Separator
- ☐ Other: _____
- ☐ None

2. If manure collection system uses either clean or reused water to flush, describe where this water goes and how it is contained.

None

FEED STORAGE CONTAINMENT

1. Describe how feed (silage, hay, etc) is contained.

- ☒ Bulk Bins
- ☐ Silage Pit
- ☐ Ag Bags
- ☐ Hay: ☐ Barn ☐ Outdoor
- ☐ Other: _____

2. Describe how feed (silage, hay, etc) runoff is contained.

- ☒ Not Applicable – Feed totally enclosed
- ☐ Other: _____
- ☐ None

RECEIVING SURFACE WATERS

1. Provide a description of the flow path from the facility to the nearest named surface water.

West buildings - grass strip or crop ground to Cox Creek - approximately 60 yards.

East buildings - crop ground to water way or tile riser inlets - approximately 30 yards.

2. What is the name of the receiving stream?

Cox Crek (EEA 01)

3. Status of the named surface water: ☒ Intermittent ☐ Perennial

4. Are any unnatural bottom deposits observed in the receiving stream: ☐ YES ☒ NO

If "YES", provide a description of the deposits: **None**

DISCHARGES		
1. Have there been any documented discharges of livestock waste to surface water ***in the past year***? If "NO" proceed to question 2.	☐ YES	☒ NO
a. If "YES", specify the date(s).		
b. What was the reason for the discharge?		
c. Was the discharge the result of a 25 year-24 hour rainfall event?	☐ YES	☐ NO
d. What was the precipitation amount? *(If applicable)*		
e. Was IEMA notified of the discharge?	☐ YES	☐ NO
f. Has the facility taken corrective action to remedy the situation which caused the discharge(s)?	☐ YES	☐ NO
If "YES", describe actions taken: **None**		
2. Is the facility currently discharging livestock waste from the production area? If "NO" proceed to next section.	☐ YES	☒ NO
b. Was the discharge the result of a 25 year-24 hour rainfall event?	☐ YES	☐ NO
c. What was the precipitation amount? *(If applicable)*		
d. What is the reason for the discharge?		

OTHER COMMENTS/NOTES

New protective footwear worn. Ashland TWP. EEA 01 (Cox Creek)/017/AW/7

West buildings were orignially Stribling Hog Farm (owned by Shawn Stribling). East buildings (oringinally owned by Oasis Farms, United Feeds aka Signature Farms and Shawn Stribling) known as DOT Farms LLC. Shawn Stribling bought the others out and is the only owner. Both sets of buildings are now known as Stribling Hog Farm.
CNMP prepared by United Feeds - Sheridan, IN
No monitoring wells at lagoon.
Typically no winter spreading, only lagoon water, some spreading to wheat ground, mostly in fall, limited in spring - heavy tank wagon want to avoid compaction.

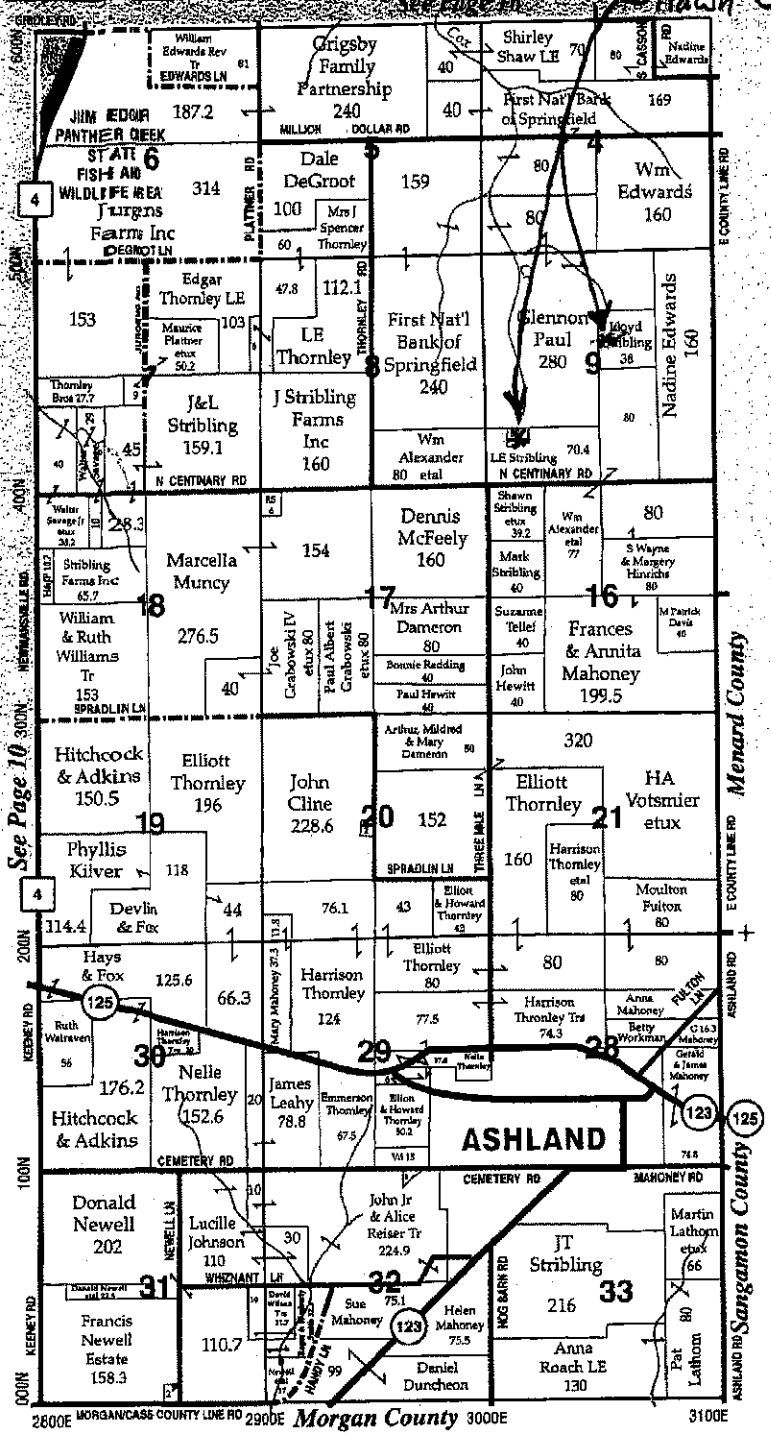
Advised to maintain minimum of 2' FB, to repair low spot in east berm of primary cell, to install a better FB marker and to land apply the rotten grain.
No discharges observed during the site visit. CAFO Permit coverage is not necessary at this time.

Attachment 1 - Plat map location Attachment 2 - Aerial photograph of site layout

Will an inspection report be attached? ☐ YES ☒ NO

INSPECTOR'S SIGNATURE	**REPORT DATE**
David P. Hinder	6-30-11

Cc: BOW/DWPC/RU Attachments: 2



spiritual needs, and Ashland's diverse businesses lend a driving economic force.

Ashland and surrounding Cass County have many attractions to offer as well. While most agree that the fall beauty of the wooded river bluffs is unparalleled in Illinois, the Sangamon and Illinois Rivers — part of the Mississippi flyway for migrating waterfowl — is a haven for hunters. In fact, the Jim Edgar Panther Creek State Fish and Wildlife Area, which is readily accessible from Ashland, offers fishing, hunting, camping and horseback riding.

Please stop by for a visit...you may even decide to stay.

The City of

Virginia

Come for a Visit, Stay for a Lifetime

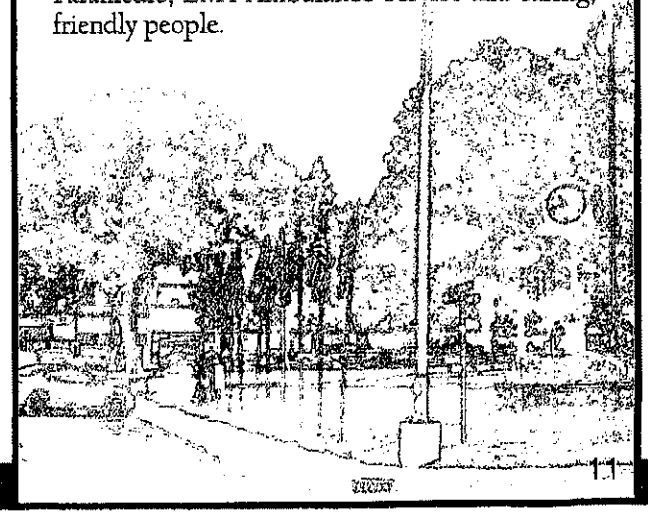
The City of Virginia, population 1800, is located in west central Illinois and serves as the county seat for Cass County. It sits just east of Beardstown and a few miles west of Springfield, our state capital. Virginia is also nestled to the north of Jacksonville and south of Havana. This unique position allows Virginia to be a central location near the Illinois River.

If you're in Virginia, then you're never far from recreation areas for hunting and fishing along with a variety of other programs for cultural enrichment. Add to that the close proximity to numerous colleges and universities plus special state schools for the deaf and blind. However, location is not the only asset that Virginia has to offer.

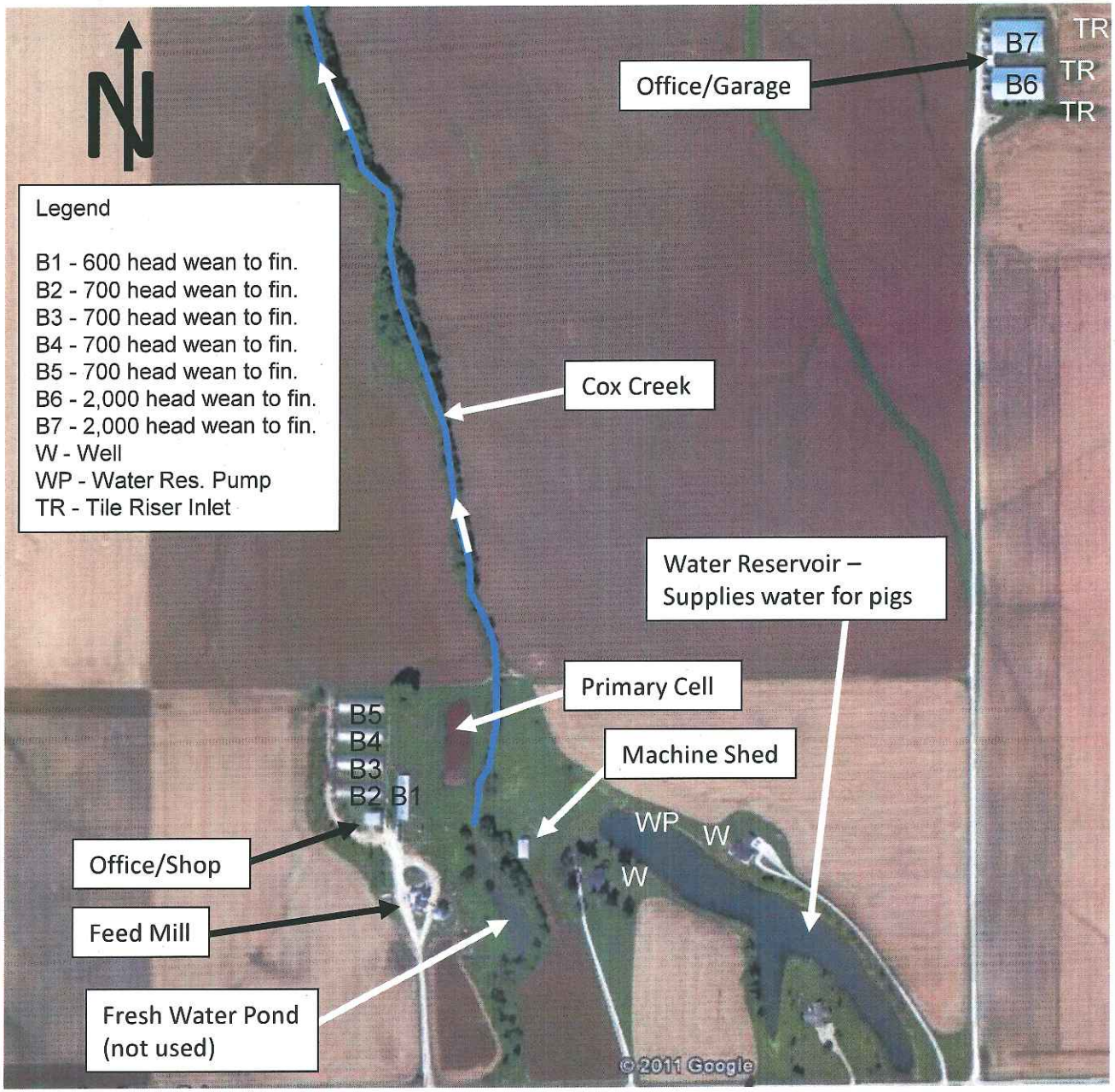
Virginia, which celebrated its 150th birthday in 1986, offers quality and meaning to life, a good solid place to build and raise a family with its two city parks, churches, schools, 119 year old weekly newspaper, library, doctor, dentist and chiropractor. This city's bank has been in business since 1870.

Surrounded by farmland, Virginia has agribusinesses, small industries and stores; shops, general services and entrepreneurs.

Our city has mayor/aldermanic form of government. It offers an excellent water supply and sewer system, low crime rate, 24 hour Paramedic, EMT Ambulance Service and caring, friendly people.



Attachment 2
Stribling Hog Farm (017AW) - Site Layout - 5/31/11 CAFO Inspection



Google Earth – 2011
Photo Date: 09/30/10